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9 **UNITED STATES DISTRICT COURT**
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11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 3047
13 ADDICTION/PERSONAL INJURY) Case No. 4:22-03047-YGR
14 PRODUCTS LIABILITY LITIGATION) Honorable Yvonne Gonzalez Rogers
15) Honorable Peter H. Kang
16 THIS DOCUMENT RELATES TO:)
17 ALL ACTIONS) **STIPULATION AND [PROPOSED]**
18) **ORDER REQUESTING ADDITIONAL**
19) **TIME FOR DISCUSSION AND**
20) **BRIEFING OF YOUTUBE SEARCH**
21) **TERMS**
22)
23)
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28)

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel,
 2 hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs and
 3 Defendants Google, LLC and YouTube, LLC (together, "YouTube" or "Defendants") to finalize
 4 search term negotiations from May 31, 2024 to June 7, 2024, with any necessary letter briefing to be
 5 submitted five business days thereafter (and no later than June 14). The parties declare in support of
 6 this request:

7 1. Plaintiffs and YouTube are engaged in ongoing search term negotiations relating to
 8 Plaintiffs' already served Requests for Production.

9 2. Plaintiffs and YouTube mutually agree that they would benefit from more time to
 10 continue their conferrals and attempt to narrow disputes regarding search terms.

11 3. Plaintiffs and YouTube believe that an extension until June 7 to finalize negotiations
 12 will afford adequate time for such negotiations.

13 4. Extending this deadline will not affect any other deadline affixed by the Court.

14 5. This is the second request to extend this deadline.¹

15 THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully
 16 request that the Court extend the deadline for Plaintiffs and YouTube to finalize search term
 17 negotiations to June 7, with any necessary letter briefing to be submitted five business days after the
 18 parties complete those discussions (no later than June 14).

19

20 **IT IS SO ORDERED,**

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22 DATED: _____ _____
PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

23

24 **IT IS SO STIPULATED AND AGREED.**

25 _____

26 ¹ Pursuant to DMC Order No. 6 (ECF 875), the Court originally ordered that search term
 27 discussions *and briefing* be concluded by May 31, 2024. On May 23, 2024, the parties requested,
 28 and the Court granted on the record, a modification to the order that discussions be concluded by
 May 31, 2024 but that briefing would be concluded by June 7, 2024. *See* May 23, 2024 Hr'g Tr.

1 Respectfully submitted,

2 DATED: May 31, 2024

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18 DATED: May 31, 2024

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16 Plaintiffs' Steering Committee Membership
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19 **ATTESTATION**

20 I, Audrey Siegel, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the
21 concurrence to the filing of this document has been obtained from each signatory hereto.

22 Dated: May 31, 2024

23 By: /s/Audrey Siegel
24 Audrey Siegel